

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION

Docket No.: 2018-320-E

IN RE: Joint Application of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to Establish Green Source Advantage Programs and Riders GSA

**PETITION TO INTERVENE ON
BEHALF OF CITY OF GREENVILLE**

The City of Greenville (“Greenville” or the “City,” as appropriate), in accordance with Section 103-825, South Carolina Code of Regulations, requests that the Public Service Commission of South Carolina (the “Commission”) permit it to intervene in the instant proceeding and in support thereof states the following:

1. On October 10, 2018, Duke Energy Carolinas, LLC (“DEC”) and Duke Energy Progress, LLC (“DEP,” together with DEC, the “Companies”), pursuant to Section 58-27-820, South Carolina Code Annotated, filed a joint application to establish a limited green tariff in South Carolina. Specifically, the Companies request the Commission approve their ‘Green Source Advantage Program’ (“GSA”) and associated Rider GSA tariffs.

2. Greenville wishes to intervene in the instant proceeding because it has a direct and substantial interest in the deliberations and outcome. The City enjoys a municipal service agreement and an operating agreement with DEC to power its substantial resources, including: buildings, physical plants and transportation assets and facilities. These resources rely on hundreds of electric meters for service. Some City residents frequently express interest in supplying Greenville’s electricity with solar generation. GSA is the only meaningful way for the City to accomplish this end.

3. Greenville’s petition to intervene is timely because, among other reasons, the Commission has not established a procedural schedule for the instant docket.

4. Other intervenors in the instant proceeding cannot adequately represent Greenville's interest because, among other reasons, none are municipalities. Greenville's participation and comment in the docket will permit the Commission to develop a record that includes a broader range of stakeholder interest in the GSA program.

5. The denial of the instant petition would impair and impede Greenville's ability to protect its interest in a diverse power generation portfolio.

6. The Commission previously granted Walmart, Inc.'s motion to intervene in the instant proceeding as an interested party and potentially eligible GSA customer.

7. An order from the Commission permitting Greenville to intervene is consistent with rulings from the North Carolina Utilities Commission ("NCUC"). NCUC permitted at least one public institution to intervene in the Companies' joint application to establish the GSA program in North Carolina. (Order entered February 27, 2018 in Docket No.: E-2, Sub 1170 and E-7, Sub 1169.) City council for the City of Charlotte recently approved a significant power purchase agreement with DEC, outlining the terms of Charlotte's participation in the GSA program under NCUC's consideration.

8. An order from the Commission permitting Greenville to intervene is further consistent with the Commission's policy, "encouraging maximum public participation in issues before the Commission" (Order No.: 2005-725 in Docket No.: 2005- 270-G, dated December 16, 2005.)

9. Pursuant to Section 103-804(T), South Carolina Code of Regulations, Greenville is represented by the following counsel in the instant proceeding:

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TURNER, PADGET,
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The City conferred upon its counsel authority to accept service of all papers and filings for purposes of the instant proceeding.

WHEREFORE Greenville requests the Commission enter an order permitting it to intervene as a party of record and participate fully in the instant proceeding.

Respectfully submitted,

March 16, 2020)	TURNER PADGET GRAHAM & LANEY, P.A.
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)	
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CERTIFICATE OF SERVICE

I hereby certify on March 16, 2020 that a true and correct copy of the foregoing was served
via electronic mail on the following:

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